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14
15 **UNITED STATES BANKRUPTCY COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 **In re:**

19 **PG&E CORPORATION,**

20 **- and -**

21 **PACIFIC GAS AND ELECTRIC
COMPANY,**

22 **Debtors.**

23 Affects PG&E Corporation
24 Affects Pacific Gas and Electric Company
 Affects both Debtors

25 * *All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

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Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**NOTICE OF FILING OF REVISED
PROPOSED ORDER APPROVING
SUBROGATION SETTLEMENT AND
RSA MOTION**

[Relates to Dkt. Nos. 3992, 4339]

Date: October 23, 2019
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas and
2 Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-
3 captioned chapter 11 cases, each filed a voluntary petition for relief under chapter 11 of title 11 of the
United States Code with the United States Bankruptcy Court for the Northern District of California (San
Francisco Division) (the “**Bankruptcy Court**”).

4 **PLEASE TAKE FURTHER NOTICE** that on September 24, 2019, the Debtors filed the
5 *Debtors’ Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for*
6 *Entry of an Order (i) Authorizing the Debtors to Enter into Restructuring Support Agreement with the*
7 *Consenting Subrogation Claimholders, (ii) Approving the Terms of Settlement with Such Consenting*
8 *Subrogation Claimholders, including the Allowed Subrogation Claim Amount, and (iii) Granting*
9 *Related Relief*, dated September 24, 2019 [Docket No. 3992] (the “**Motion**”). A hearing on the Motion
is scheduled to be held on **October 23, 2019, at 10:00 a.m. (Pacific Time)** (the “**Omnibus Hearing**”)
at the Bankruptcy Court in the courtroom of the Honorable Dennis Montali, United States Bankruptcy
Judge, Courtroom 17, 16th Floor, 450 Golden Gate Avenue, San Francisco, California 94102.

10 **PLEASE TAKE FURTHER NOTICE** that a proposed form of order with respect to the relief
sought therein was attached as Exhibit B to the Motion (the “**Original Proposed Order**”).

11 **PLEASE TAKE FURTHER NOTICE** that, attached hereto as **Exhibit 1-1** and **Exhibit 1-2**,
12 respectively, are copies of the Debtors’ revised proposed order on the Motion (the “**Revised Proposed**
13 **Order**”) and a redline comparison of the Revised Proposed Order against the Original Proposed Order.

14 **PLEASE TAKE FURTHER NOTICE** that the Debtors reserve the right to further amend,
modify, or supplement the proposed order on the Motion at any time up to and during the Omnibus
15 Hearing.

16 **PLEASE TAKE FURTHER NOTICE** that copies of the pleadings and other documents
17 identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court’s website at
18 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate
19 Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime Clerk LLC,
at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based
parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@primeclerk.com. Note
that a PACER password is needed to access documents on the Bankruptcy Court’s website.

20 Dated: October 22, 2019

21 **WEIL, GOTSHAL & MANGES LLP**
22 **CRAVATH, SWAINE & MOORE LLP**
23 **KELLER & BENVENUTTI LLP**

24 /s/ Thomas B. Rupp
Thomas B. Rupp

25 *Attorneys for Debtors and Debtors in Possession*